

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION

FILED
RICHARD W. NAGEL
CLERK OF COURT

2020 AUG 19 PM 2:53

UNITED STATES OF AMERICA

v.

OMAR SHARIF MOHAMED HASSAN (1)
aka O-Bandz

JAMIL JAMAL ABDALLA (2)

MOHAMED ABDULKADIR MOHAMUD (3)
aka Bash

MOHAMED ABDI HIRAD (4)
aka Mo Trippin'
aka Trippin'

ABDIRAHIM MAHMOUD DUALEH (5)
aka AD

SHAMARKE IGAL (6)
aka Marke

AHMED AHMED (7)
aka Seven

ABDIAZIZ SAID AHMED (8)
aka Breezy

IBRAHIM ALI (9)
aka Ebey

MOHAMED SHARIF ALI MOHAMED (10)
aka MoMo

HUSSEIN AHMED (11)

CASE NO. 2:20-cr-00139

JUDGE Saunders

INDICTMENT

18 U.S.C. § 2
18 U.S.C. § 371
18 U.S.C. § 922(a)(5)
18 U.S.C. § 922(a)(6)

FORFEITURE

THE GRAND JURY CHARGES:

COUNT 1
(Conspiracy to Illegally Traffic Firearms)

1. Beginning at least in or around July 2018, the exact date being unknown to the Grand Jury, and continuing through at least in or around the middle part of 2019, in the Southern District of Ohio and elsewhere, the Defendants—**OMAR SHARIF MOHAMED HASSAN, aka O-Bandz; JAMIL JAMAL ABDALLA; MOHAMED ABDULKADIR MOHAMUD, aka Bash; MOHAMED ABDI HIRAD, aka Mo Trippin', aka Trippin'; ABDIRAHIM MAHMOUD DUALEH, aka AD; AHMED AHMED, aka Seven; SHAMARKE IGAL, aka Marke; ABDIAZIZ SAID AHMED, aka Breezy; IBRAHIM ALI, aka Ebey; MOHAMED SHARIF ALI MOHAMED, aka MoMo; and HUSSEIN AHMED**—and others, both known and unknown to the Grand Jury, did knowingly and willfully combine, conspire, confederate, and agree together and with other persons, to commit certain offenses against the United States, to wit: Transferring, selling, giving, smuggling, and delivering firearms to persons not residing in the State where the transferor resides, in violation of 18 U.S.C. § 922(a)(5).

MANNER AND MEANS OF THE CONSPIRACY

2. It was part of the conspiracy that the defendants and their co-conspirators would acquire firearms through both legal means (e.g., private sales) and through illegal means (e.g., straw purchases at gun shows), stockpile these firearms, and then smuggle these firearms to Canada for the purpose of illegally reselling these firearms for profit.

3. It was further part of the conspiracy that a small group of co-conspirators, including **OMAR SHARIF MOHAMED HASSAN, aka O-Bandz**, were the first to acquire, stockpile, smuggle, and sell the firearms in Canada.

4. It was further part of the conspiracy that the organizational structure of the conspiracy was informal, and changed over time.

5. It was further part of the conspiracy that **OMAR SHARIF MOHAMED HASSAN, aka O-Bandz**, was one of the leaders of the conspiracy. In this role, **OMAR SHARIF MOHAMED HASSAN, aka O-Bandz**, recruited additional co-conspirators, and told and showed other co-conspirators how to conduct the conspiracy. Also in this role, **OMAR SHARIF MOHAMED HASSAN, aka O-Bandz**, took part in, oversaw, was aware of, or allowed to happen, the stockpiling and smuggling of many of the loads of firearms to Canada. Also in this role, **OMAR SHARIF MOHAMED HASSAN, aka O-Bandz**, took part in disciplining other co-conspirators for mistakes made in the operation of the conspiracy.

6. It was further part of the conspiracy that **OMAR SHARIF MOHAMED HASSAN, aka O-Bandz**, and other co-conspirators, including **JAMIL JAMAL ABDALLA, ABDIAZIZ SAID AHMED, aka Breezy, SHAMARKE IGAL, aka Marke, ABDIRAHIM MAHMOUD DUALEH, aka AD**, and others known and unknown to the Grand Jury, conducted meetings to plan the operation and execution of the conspiracy.

7. It was further part of the conspiracy that various co-conspirators successfully recruited female drivers to smuggle firearms across the border into Canada or pick up money related to the conspiracy in Canada, doing so by promising them, among other things, a free trip to Canada, payment, and access to drugs and alcohol.

8. It was further part of the conspiracy that the co-conspirators often used Toyota Camrys for execution of the conspiracy—in particular to smuggle the stockpiled firearms or money across the Canadian border, doing so because Toyota Camrys had a large void in the front-center console that could be removed for storage of firearms and money.

9. It was further part of the conspiracy that the execution of the conspiracy was informal. After **OMAR SHARIF MOHAMED HASSAN, aka O-Bandz**, and others, told and showed other co-conspirators how to conduct the conspiracy, the conspiracy came to be executed by various groups of co-conspirators. Sometimes, these groups worked directly with **OMAR SHARIF MOHAMED HASSAN, aka O-Bandz**. Although the execution of the conspiracy was informal in this regard, the co-conspirators generally operated with the knowledge and approval of **OMAR SHARIF MOHAMED HASSAN, aka O-Bandz**.

OVERT ACTS

10. In furtherance of the conspiracy, and in order to effect the objects thereof, at least one of the co-conspirators committed or caused to be committed, in the Southern District of Ohio, and elsewhere, at least one of the following overt acts, among others:

11. On or about July 2, 2018, the following defendants traveled from the United States into Canada: **OMAR SHARIF MOHAMED HASSAN, aka O-Bandz**; **JAMIL JAMAL ABDALLA**; and **MOHAMED ABDULKADIR MOHAMUD, aka Bash**.

12. On or about July 3, 2018, **JAMIL JAMAL ABDALLA** and **AHMED AHMED, aka Seven**, traveled from Canada into the United States, at which time approximately \$11,470 was seized by law enforcement.

13. On or about July 21, 2018, **JAMIL JAMAL ABDALLA** and **MOHAMED ABDULKADIR MOHAMUD, aka Bash**, traveled from the United States into Canada.

14. On or about July 22, 2018, **JAMIL JAMAL ABDALLA** and **MOHAMED ABDULKADIR MOHAMUD, aka Bash**, traveled from Canada into the United States.

15. On or about September 8, 2018, **MOHAMED ABDULKADIR MOHAMUD, aka Bash**, and **AHMED AHMED, aka Seven**, traveled from the United States into Canada.

16. On or about September 12, 2018, approximately \$25,191 was seized by law enforcement from **OMAR SHARIF MOHAMED HASSAN, aka O-Bandz**, and **JAMIL JAMAL ABDALLA** at the John Glenn Columbus International Airport.

17. On or about October 5, 2018, **MOHAMED SHARIF ALI MOHAMED, aka MoMo**, and an unindicted co-conspirator, traveled from Canada into the United States.

18. On or about December 31, 2018, **OMAR SHARIF MOHAMED HASSAN, aka O-Bandz**, **ABDIRAHIM MAHMOUD DUALEH, aka AD**, and **ABDIAZIZ SAID AHMED, aka Breezy** traveled from the United States into Canada.

19. On or about January 14, 2019, **ABDIRAHIM MAHMOUD DUALEH, aka AD**, and **ABDIAZIZ SAID AHMED, aka Breezy**, traveled from Canada into the United States.

20. On or about January 18, 2019, **OMAR SHARIF MOHAMED HASSAN, aka O-Bandz**, traveled from Canada into the United States.

21. On or about January 23, 2019, **MOHAMED ABDI HIRAD, aka Mo Trippin'**, **aka Trippin'**, traveled from the United States into Canada.

22. On or about January 25, 2019, **MOHAMED ABDULKADIR MOHAMUD, aka Bash**, rented a Toyota Camry at a Hertz Car Rental located in the Southern District of Ohio.

23. On or about January 26, 2019, **MOHAMED ABDULKADIR MOHAMUD, aka Bash**, and **AHMED AHMED, aka Seven**, traveled from the United States into Canada.

24. On or about January 28, 2019, **MOHAMED SHARIF ALI MOHAMED, aka MoMo**, traveled from the United States into Canada.

25. On or about February 8, 2019, **ABDIAZIZ SAID AHMED, aka Breezy**, traveled from Canada into the United States.

26. On or about February 13, 2019, **ABDIAZIZ SAID AHMED, aka Breezy**, traveled from Canada into the United States.

27. On or about March 1, 2019, **OMAR SHARIF MOHAMED HASSAN, aka O-Bandz**, traveled from Canada into the United States.

28. On or about March 11, 2019, an individual known to the Grand Jury attempted to travel from the United States into Canada; the car driven by this individual was found at the United States–Canada border to contain multiple firearms.

29. On or about April 14, 2019, **OMAR SHARIF MOHAMED HASSAN, aka O-Bandz**, was issued a citation by law enforcement in Columbus, Ohio for driving without a license and driving the wrong way on a one-way street; two firearms were found during this encounter, one of which was a Glock pistol bearing serial number BBTH686, located in the car driven by **OMAR SHARIF MOHAMED HASSAN, aka O-Bandz**.

30. On or about April 16, 2019, in the Southern District of Ohio, **MOHAMED ABDI HIRAD, aka Mo Trippin', aka Trippin'**, provided paperwork to Toyota Financial Services to secure financing for the lease of a Toyota Camry.

31. On or about April 20, 2019, an individual known to the Grand Jury attempted to travel from the United States into Canada; the car driven by this individual was found at the United States–Canada border to contain multiple firearms.

32. On or about April 23, 2019, an individual known to the grand jury attempted to travel from the United States into Canada; the car driven by this individual was found at the United States–Canada border to contain multiple firearms, one of which was the Glock pistol bearing serial number BBTH686, located in the car driven by **OMAR SHARIF MOHAMED HASSAN, aka O-Bandz**, on or about April 14, 2019.

33. On or about April 24, 2019, **MOHAMED ABDI HIRAD, aka Mo Trippin', aka Trippin'**, and **IBRAHIM F. ALI, aka Ebey**, traveled from the United States into Canada.

34. On or about April 25, 2019, **IBRAHIM F. ALI, aka Ebey**, caused the submission of a false police report.

35. On or about April 27, 2019, **HUSSEIN AHMED** traveled from Canada into the United States.

36. On or about April 27, 2019, **HUSSEIN AHMED** and an unindicted co-conspirator attended the C&E Gun Show held at the Ohio Expo Center in Columbus, Ohio. While at the gun show, **HUSSEIN AHMED** and the unindicted co-conspirator caused two individuals to conduct straw purchases of four firearms.

All in violation of 18 U.S.C. § 371.

COUNT 2
(False Statement During the Acquisition of Firearms)

On or about April 27, 2019, in the Southern District of Ohio, **HUSSEIN AHMED**, in connection with the acquisition of firearms—to wit: a Ruger manufactured, model LCP II, .380 caliber, semi-automatic pistol with serial number 380246459; a Glock manufactured, model 17GEN4, 9mm caliber, semi-automatic pistol with serial number BBHP967; a Glock manufactured, model 26, 9mm caliber, semi-automatic pistol with serial number BEUL035; and

a Glock manufactured, model 19GEN4, 9mm caliber, semi-automatic pistol with serial number BFRM943—did aid and abet an unindicted co-conspirator in knowingly making false and fictitious written statements on Forms 4473 to federally licensed firearms dealers, which statements were intended and likely to deceive the dealers as to a fact material to the lawfulness of the sale and other disposition of the firearms.

All in violation of 18 U.S.C. §§ 922(a)(6) and 2.

FORFEITURE ALLEGATION

The allegations of this Indictment are realleged and by this reference fully incorporated herein for the purpose of alleging forfeitures to the United States of America pursuant to 18 U.S.C. § 924(d)(1) and 28 U.S.C. § 2461(c).

Upon conviction of any offense alleged in this Indictment, the defendants shall forfeit to the United States, pursuant to 18 U.S.C. § 924(d) and 28 U.S.C. § 2461(c), any firearm or ammunition involved in or used in such offense.

Substitute Assets

If any of the property described above as being subject to forfeiture, as a result of any act or omission of a defendant—

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property that cannot be subdivided without difficulty—


the defendant shall forfeit to the United States any other property of the defendant, up to the value of the property described above, pursuant to 21 U.S.C. § 853(p), as incorporated by 28 U.S.C. § 2461(c).

Forfeiture pursuant to 18 U.S.C. § 924(d)(1), 28 U.S.C. § 2461(c), and Rule 32.2 of the Federal Rules of Criminal Procedure.


A TRUE BILL.

s/ Foreperson
FOREPERSON

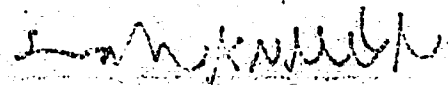
DAVID M. DEVILLERS
UNITED STATES ATTORNEY



S. COURTER SHIMEALL (0090514)
Assistant United States Attorney



KELLY A. NORRIS (0081254)
Assistant United States Attorney

A handwritten signature in dark ink, appearing to be "J. J. Smith", written in a cursive style.A handwritten signature in dark ink, appearing to be "J. J. Smith", written in a cursive style.